

requisite city grade signal to Dadeville.¹²⁸ The Dadeville Proposal would comply with the minimum distance separation requirements with the exception of the Auburn Proposal. Thus, Cox's Counterproposal is mutually exclusive with the Auburn Proposal. As proposed, the Channel 262A service area would contain 43,600 persons in an area of 2,460 square kilometers with no resulting gains or losses of service.¹²⁹ The proposed channel substitution does not provide 70 dBu coverage to any urbanized area.¹³⁰

IV. PROPOSED SUBSTITUTION OF CHANNEL 300A FOR CHANNEL 247A, ORRVILLE, ALABAMA.

46. To accommodate the Gardendale Proposal, Cox proposes to substitute Channel 300A for Channel 247A in Orrville, Alabama, at a new reference site for WJAM-FM (the "Orrville Proposal"). Scott Communications, licensee of WJAM-FM, has consented to the modification of WJAM-FM's license from Channel 247A to Channel 300A and the change of transmitter site. Scott Communications has agreed to file an application to implement the changes consistent with the Commission's spacing rules upon grant of the Counterproposal.¹³¹ In accordance with the Commission's policies, Cox pledges to reimburse Scott Communications for its reasonable costs in implementing the channel substitution.

47. As indicated in the Technical Exhibit, the Orrville Proposal complies with the Commission's technical requirements.¹³² Operation from the proposed site at Orrville would provide the requisite city grade signal coverage to Orrville and would comply with the minimum

¹²⁸ See *id.*

¹²⁹ See *id.*

¹³⁰ See *id.*

¹³¹ A copy of the consent is included as Exhibit F.

¹³² See *id.*

distance separation requirements, with the exception of the existing Channel 247A at Orrville.¹³³ As proposed, the Channel 300A service area would contain 43,760 persons over an area of 2,460 square kilometers with a net service loss of 1,765 persons.¹³⁴ The loss area would continue to receive service from at least five other full-time stations¹³⁵ and thus is considered to be well-served.¹³⁶

V. PROPOSED ALLOTMENT OF CHANNEL 248A TO GOODWATER, ALABAMA, AS FIRST LOCAL SERVICE.

48. To accommodate the Gardendale Proposal, Cox proposes to reallocate Channel 248A from Talladega to Goodwater, Alabama, for use by WSSY-FM as Goodwater's first local service (the "Goodwater Proposal"). Williamson Broadcasting, Inc. ("Williamson"), licensee of WSSY-FM, has consented to the modification of WSSY-FM's license to change its community of license and transmitter site and agreed to file an application to implement the changes consistent with the Commission's spacing rules upon grant of the Counterproposal.¹³⁷ Moreover, Scott Communications, which holds an option to acquire WSSY-FM from Williamson, has agreed to exercise such option and to file an application with the Commission to implement the facilities changes upon grant of Cox's Counterproposal.¹³⁸ In accordance with the Commission's policies,

¹³³ See *id.*

¹³⁴ See *id.*

¹³⁵ See *id.*

¹³⁶ *Llano and Marble Falls, Texas*, 12 FCC Rcd 6809, ¶ 6 (1997), *recon. denied*, 13 FCC Rcd 25039 (1998) ("*Llano*").

¹³⁷ A copy of the consent is included as Exhibit G.

¹³⁸ See Exhibit A (Letter from Paul Scott Alexander of Scott Communications, Inc. dated June 15, 2001).

Cox pledges to reimburse Williamson or Scott Communications, as the case may be, for its reasonable costs in implementing the channel substitution.

A. Technical Compliance.

49. The Goodwater Proposal complies with the Commission's technical requirements.¹³⁹ Operation from the proposed site would provide the requisite city grade signal coverage to Goodwater and would comply with the minimum distance separation requirements with the exception of Channel 248A at Pine Level, Alabama, Channel 249A at Clanton, Alabama, and Channel 247A at Dadeville (which is addressed by the Dadeville Proposal).¹⁴⁰ As discussed herein, Cox's Counterproposal includes a change in the reference coordinates for Pine Level, the reference coordinates and community of license for Clanton, and a proposed channel substitution for Dadeville to accommodate the Goodwater Proposal. As required by Section 1.420(i) of the Commission's rules, the proposed allotment of Channel 248A at Goodwater is mutually exclusive with WSSY-FM's present assignment of Channel 248A at Talladega, Alabama.¹⁴¹

50. The proposed Channel 248A dBu service area would contain 49,390 persons in an area of 2,460 square kilometers with a "net" loss of 27,230 persons.¹⁴² Except as noted below, the loss area would contain service from at least five other full-time stations and thus is considered to be well-served.¹⁴³ A small area of 9 square kilometers containing 67 persons within the loss area will contain three remaining full-time services and two areas over a

¹³⁹ See Exhibit B (Technical Exhibit).

¹⁴⁰ See *id.*

¹⁴¹ See *id.*

¹⁴² See *id.*

¹⁴³ See *id.*

cumulative area of 98.3 square kilometers containing 1,376 persons within the loss area will contain four remaining full-time services.¹⁴⁴ Upon reallocation of Channel 248A, Talladega would have two remaining full-time aural services: WTDR(FM) on Channel 224A and WNUZ(AM) on 1230 kHz.¹⁴⁵ No aural services are assigned to Goodwater.¹⁴⁶ Thus, grant of Cox's Counterproposal would provide Goodwater with its first local aural service while leaving Talladega with two remaining full-time aural services, resulting in a preferential arrangement of allotments.

B. Goodwater is a Community Deserving of First Local Aural Service.

51. The City of Goodwater, Alabama, qualifies as a community and merits a first local aural service preference. Goodwater is an incorporated city, listed in the Census, and thus meets the basic criteria for a community.¹⁴⁷ Moreover, Goodwater's local government and businesses all identify themselves with the community of Goodwater and thereby create a cohesive network for the residents of the city.¹⁴⁸

52. The City of Goodwater is not located within any Census-defined Urbanized

¹⁴⁴ See *id.*

¹⁴⁵ See *id.*

¹⁴⁶ See *id.*

¹⁴⁷ See e.g., *Pontotoc, Tennessee*, 11 FCC Rcd 14430, ¶ 15 (1996) (stating that the proposed community's incorporation and listing in the Census meet the Commission's basic criteria for a community); *Brookline, Missouri*, 10 FCC Rcd 13038, ¶ 4 (1995) ("While 'incorporation is not a prerequisite [for community status], and while a community need not have a clearly delineated area and population, it is no doubt correct to state that in most cases a community is a city, town, village, or other political subdivision"); *Naples, Florida*, 69 FCC 277, ¶ 11 (1997) (stating that the question of community status is "easily answered" "[i]f it is an incorporated community").

¹⁴⁸ See *Las Vegas and Rowe, New Mexico*, 2001 FCC Lexis 559, ¶ 3 (FCC Jan. 26, 2001).

Area and would not encompass any portion of an Urbanized Area.¹⁴⁹ Accordingly, a *Tuck* analysis demonstrating that Goodwater is independent of an Urbanized Area is not required.¹⁵⁰

53. Goodwater is an incorporated city¹⁵¹ with a population of 1,633 persons¹⁵² and occupies an area of 1,694 square kilometers.¹⁵³ Goodwater has its own city hall¹⁵⁴ and local government, which is headed by Mayor Lonnie Caldwell.¹⁵⁵ The local government includes a five-member City Council, and committees and commissions such as the Planning “Zoning” Commission, Parks and Recreation Committee, Medical Clinic Board, and Emergency Medical Service Board.¹⁵⁶ Goodwater has a police department led by Police Chief Harold Strong and Lieutenant Gerald Whetstone.¹⁵⁷ The police department “is staffed around the clock with dispatchers and officers” and is equipped with a jail.¹⁵⁸ The Goodwater Fire Department is staffed by thirty-two volunteers and has an ambulance service staffed by twenty-six

¹⁴⁹ See Exhibit B (Technical Exhibit).

¹⁵⁰ *Tuck*; see, e.g., *Headland, Alabama, and Chattahooche, Florida*, 10 FCC Rcd 10352, ¶ 11 (1995).

¹⁵¹ See Exhibit H (2000 Rand McNally Commercial Atlas and Marketing Guide).

¹⁵² See Exhibit H (Census Bureau, Census 2000).

¹⁵³ See Exhibit H (Official City Sites (visited June 16, 2001) <<http://officialcitysites.org/city.php3?st=AL&cityname=Goodwater>>).

¹⁵⁴ See Exhibit H (Goodwater Online City Hall (visited June 14, 2001) <<http://www.goodwater.org/cityhall.html>>).

¹⁵⁵ See Exhibit H (Goodwater Online Mayor & City Council (visited June 14, 2001) <<http://www.goodwater.org/council.html>>).

¹⁵⁶ See Exhibit H (Goodwater Online Boards & Commissions (visited June 14, 2001) <<http://www.goodwater.org/boards.html>>).

¹⁵⁷ See Exhibit H (Goodwater Online Police Department (visited June 14, 2001) <<http://www.goodwater.org/police.html>>).

¹⁵⁸ See *id.*

volunteers.¹⁵⁹ Goodwater has its own Water Works and Sewer Board that provides public utilities¹⁶⁰ and has a public transportation system.¹⁶¹ Goodwater has its own zip code (35072).¹⁶² All of these services provide an essential network of public services for the residents of Goodwater.

54. Goodwater offers its residents a variety of community and cultural resources. Goodwater has its own public library,¹⁶³ a Senior Citizens Center,¹⁶⁴ a youth center,¹⁶⁵ and a Rotary Club.¹⁶⁶ Churches in Goodwater include the Goodwater Baptist Church, Goodwater Church of God of Prophecy, the Goodwater Presbyterian Church, and the Goodwater United Methodist Church.¹⁶⁷ In addition, a number of businesses identify themselves with the name of

¹⁵⁹ See Exhibit H (Goodwater Online Fire & Ambulance (visited June 14, 2001) <<http://www.goodwater.org/fire.html>>).

¹⁶⁰ See Exhibit H (Goodwater Online Public Works (visited June 14, 2001) <<http://www.goodwater.org/publicworks.html>>).

¹⁶¹ See Exhibit H (Goodwater Online Senior Citizens Center and Public Transportation (visited June 14, 2001) <<http://www.goodwater.org/seniors.html>>).

¹⁶² See Exhibit H (United States Postal Service City State / Zip Code Associations (visited June 14, 2001) <<http://www.usps.gov/cgi-bin/zip4/ctystzip2>>).

¹⁶³ See Exhibit H (Goodwater Public Library (visited June 14, 2001) <<http://www.goodwater.org/library.html>>).

¹⁶⁴ See Exhibit H (Goodwater Online Senior Citizens Center and Public Transportation (visited June 14, 2001) <<http://www.goodwater.org/seniors.html>>).

¹⁶⁵ See Exhibit H (Yahoo! Yellow Pages (visited June 14, 2001) <<http://yp.yahoo.com/py/ypResults.py?stx=goodwater&stp=a&tab=B2C&city=Goodwater&state=AL&country=us&slt=33.088699&sln=-86.070000&cs=5>>).

¹⁶⁶ Conversation with Goodwater City Clerk.

¹⁶⁷ See Exhibit H (Yahoo! Yellow Pages (visited June 14, 2001) <<http://http://yp.yahoo.com/py/ypResults.py?stx=goodwater&stp=a&tab=B2C&city=Goodwater&state=AL&country=us&slt=33.088699&sln=-86.070000&cs=5>>).

the town, such as the Goodwater Amoco Food Shop, Goodwater Auto Parts, Goodwater Discount Drug, and Piggly Wiggly Foodstore of Goodwater.¹⁶⁸

55. In light of the strong indicia of a nexus between the community and its political, social and commercial organizations, the City of Goodwater clearly merits community status for FCC allotment purposes. A grant of the proposal would provide first local aural service to the residents of Goodwater.

VI. PROPOSED MODIFICATION TO VACANT CHANNEL 248A, PINE LEVEL, ALABAMA.

56. To accommodate the Goodwater Proposal and ultimately the Gardendale Proposal, Cox proposes to modify the reference coordinates of vacant and unapplied-for Channel 248A, Pine Level, Alabama (the “Pine Level Proposal”). As indicated in the Technical Exhibit, the Pine Level Proposal complies with the Commission’s technical requirements.¹⁶⁹ Operation from the proposed site at Pine Level would provide the requisite city grade signal coverage to all of Pine Level and would comply with the minimum distance separation requirements.¹⁷⁰ As proposed, the Channel 248A service area would contain 28,920 persons in an area of 2,460 square kilometers.¹⁷¹ Operation from the modified reference coordinates would result in a “net” gain of 12,200 persons.¹⁷² The loss area would contain service from at least five other full-time stations and thus is well-served.¹⁷³

¹⁶⁸ See *id.*

¹⁶⁹ See Exhibit B (Technical Exhibit).

¹⁷⁰ See *id.*

¹⁷¹ See *id.*

¹⁷² See *id.*

¹⁷³ See *id.*

VII. PROPOSED REALLOTMENT OF CHANNEL 249A TO JEMISON, ALABAMA, AS FIRST LOCAL SERVICE.

57. To accommodate the Goodwater Proposal and ultimately the Gardendale Proposal, Cox proposes to reallocate Channel 249A from Clanton to Jemison, Alabama, for use by WEZZ-FM as its first local service (the “Jemison Proposal”). Southeastern Broadcasting Co. (“Southeastern”), licensee of WEZZ-FM, has consented to the modification of WEZZ-FM’s license to change its community of license and transmitter site and agreed to file an application to implement the changes consistent with the Commission’s spacing rules upon grant of the Counterproposal.¹⁷⁴ Moreover, Scott Communications, which holds an option to acquire WEZZ-FM from Southeastern has agreed to exercise such option and to file an application with the Commission to implement the facilities changes upon grant of Cox’s Counterproposal.¹⁷⁵ In accordance with the Commission’s policies, Cox pledges to reimburse Southeastern or Scott Communications, as the case may be, for its reasonable costs in implementing the proposal.

A. Technical Compliance.

58. The Jemison Proposal complies with the Commission’s technical requirements.¹⁷⁶ Operation from the proposed site would provide the requisite city grade signal coverage to Jemison and would comply with the minimum distance separation requirements.¹⁷⁷ The proposed allotment of Channel 249A at Jemison is mutually exclusive with WEZZ-FM’s present

¹⁷⁴ A copy of the consent is included as Exhibit I.

¹⁷⁵ See Exhibit A (Letter from Paul Scott Alexander of Scott Communications, Inc. dated June 15, 2001).

¹⁷⁶ See Exhibit B (Technical Exhibit).

¹⁷⁷ See *id.*

assignment of Channel 249A at Clanton, Alabama and thus complies with Section 1.420(i) of the Commission's rules.¹⁷⁸

59. The Channel 249A service area would contain 60,580 persons in an area of 2,460 square kilometers.¹⁷⁹ The substitution would result in a "net" gain of 15,700 persons.¹⁸⁰ The loss area would contain service from at least five other full-time stations and thus is well-served.¹⁸¹ No aural services are assigned to Jemison.¹⁸² Clanton would have a remaining local aural daytime service from WKLF(AM) on 980 kHz.¹⁸³ Accordingly, grant of Cox's Counterproposal would provide Jemison with its first local aural service and achieve a preferential arrangement of allotments.¹⁸⁴

B. Jemison is a Community Deserving of First Local Aural Service.

60. The Town of Jemison, Alabama, qualifies as a community under the criteria set forth above and merits a first local aural service preference. Jemison is an incorporated town¹⁸⁵ and its population is listed in the U.S. Census,¹⁸⁶ thus satisfying the Commission's basic criteria for community status.¹⁸⁷ Jemison's local government, social organizations, and local businesses

¹⁷⁸ See *id.*

¹⁷⁹ See *id.*

¹⁸⁰ See *id.*

¹⁸¹ See *id.*

¹⁸² See *id.*

¹⁸³ See *id.*

¹⁸⁴ See *Geneseo, Illinois and DeWitt, Iowa*, 12 FCC Rcd 19477, ¶ 4 (1997) (granting proposal for first local aural service where present community would continue to be served by a daytime-only AM station).

¹⁸⁵ See Exhibit J (2000 Rand McNally Commercial Atlas and Marketing Guide).

¹⁸⁶ See Exhibit J (U.S. Census, Census 2000).

¹⁸⁷ See *e.g., Pontotoc, Tennessee*, 11 FCC Rcd 14430, ¶ 15 (1996) (stating that the proposed community's incorporation and listing in the Census meet the Commission's basic criteria for

continued...

all identify themselves with the community of Jemison and create a cohesive network for the residents of the town.

61. The Town of Jemison is not located within any Census-defined Urbanized Area and would not encompass any portion of an Urbanized Area.¹⁸⁸ Accordingly, a *Tuck* analysis demonstrating that Jemison is independent of an Urbanized Area is not required.¹⁸⁹

62. As The Jemison Inn describes on its website, Jemison is a “small, quaint town with all its old-fashioned sights and sounds.”¹⁹⁰ Jemison is incorporated,¹⁹¹ has a population of 2,248 people¹⁹² and occupies an area of 19.663 square kilometers.¹⁹³ Jemison is the second largest municipality in Chilton County.¹⁹⁴ Jemison has its own city hall and local government,¹⁹⁵

...continued

allotment purposes); *Brookline, Missouri*, 10 FCC Rcd 13038, ¶ 4 (1995) (“While ‘incorporation is not a prerequisite [for community status], and while a community need not have a clearly delineated area and population, it is no doubt correct to state that in most cases a community is a city, town, village, or other political subdivision.’”); *Naples, Florida*, 69 FCC 277, ¶ 11 (1997) (stating that the question of community status is “easily answered” “[i]f it is any incorporated community”).

¹⁸⁸ See Exhibit B (Technical Exhibit).

¹⁸⁹ *Tuck*; see, e.g., *Headland, Alabama, and Chattahoochee, Florida*, 10 FCC Rcd 10352, ¶ 11 (1995).

¹⁹⁰ See Exhibit J (Bed and Breakfast Online Jemison Inn (visited June 13, 2001) <<http://www.bbonline.com/al/jemison>>).

¹⁹¹ See Exhibit J (2000 Rand McNally Commercial Atlas and Marketing Guide).

¹⁹² See Exhibit B (Technical Exhibit).

¹⁹³ See Exhibit J (Key to the City (visited June 13, 2001) <<http://www.pe.net/~rksnow/alcountyjemison.htm>>).

¹⁹⁴ See Exhibit J (Jemison High School and Its Community (visited June 13, 2001) <<http://home.hiwaay.net/~jhs1/Community/community.html>>).

¹⁹⁵ Conversation with City Clerk.

led by Mayor Kenneth Ray¹⁹⁶ and five council members.¹⁹⁷ Jemison's police department is led by Police Chief Jeff Townsend¹⁹⁸ and staffed by five full-time and three part-time officers.¹⁹⁹ Jemison's fire department is staffed by nineteen volunteers.²⁰⁰ Jemison has its own post office²⁰¹ and its own zip code (35085).²⁰² Jemison has its own Jemison Public Library,²⁰³ and residents may attend any one of many churches.²⁰⁴ Jemison has a Masonic Lodge,²⁰⁵ and numerous businesses identify themselves with the name of the town: Jemison Building Supply, Jemison Florist, Jemison Interstate Chevron, Jemison Mart, and Jemison True Value Home Center.²⁰⁶

63. In light of the strong indicia of a nexus between the community and its political, social and commercial organizations, the Town of Jemison clearly merits community status for FCC allotment purposes. A grant of the proposal would provide the residents of this community

¹⁹⁶ See Exhibit J (Alabama League of Municipalities, Elected Mayors (visited June 17, 2001) <<http://www.alalm.org/>>).

¹⁹⁷ Conversation with City Clerk.

¹⁹⁸ See Exhibit J (Jemison Police Department (visited June 13, 2001) <<http://www.usacops.com/alp35085>>).

¹⁹⁹ Conversation with City Clerk.

²⁰⁰ *Id.*

²⁰¹ *Id.*

²⁰² See Exhibit J (United States Post Office City/State Zip Code Associations (visited June 13, 2001) <<http://www.usps.gov/cgi-bin/zip4/ctystzip2.html>>).

²⁰³ See Exhibit J (Yahoo! Yellow Pages (visited June 13, 2001) <<http://http://yp.yahoo.com/py/ypResults.py?stx=jemison&stp=a&tab=B2C&city=Jemison&state=AL&country=us&slt=32.966099&sln=-86.740303&cs=5>>).

²⁰⁴ See Exhibit J (Church List for Jemison, Alabama (visited June 13, 2001) <<http://www.churchangel.com/WEBAL/jemison.htm>>).

²⁰⁵ Conversation with City Clerk.

²⁰⁶ See Exhibit (Yahoo! Yellow Pages (visited June 17, 2001) <<http://yp.yahoo.com/py/ypResults.py?stx=jemison&stp=a&tab=B2C&city=Jemison&state=AL&country=us&slt=32.966099&sln=-86.740303&cs=5>>).

with their first local aural service. Accordingly, the Commission should grant the counterproposal to reallocate Channel 249A from Clanton to Jemison, Alabama.

VIII. PROPOSED MODIFICATION TO CHANNEL 249A, THOMASTON, ALABAMA.

64. To accommodate the provision of first local service to Jemison and ultimately the Gardendale Proposal, the Counterproposal proposes to modify the reference coordinates of WAYI(FM), Channel 249A, Thomaston, Alabama (the “Thomaston Proposal”). Marengo Broadcast Associates (“Marengo”), licensee of WAYI(FM), has consented to the modification of WAYI(FM)’s license to change its transmitter site and agreed to file an application to implement the changes consistent with the Commission’s spacing rules upon grant of the Counterproposal.²⁰⁷ In accordance with the Commission’s policies, Cox pledges to reimburse Marengo for its reasonable costs in implementing the channel substitution.

65. The Thomaston Proposal complies with the Commission’s technical requirements.²⁰⁸ Operation from the proposed site at Thomaston would provide the requisite city grade signal coverage to all of Thomaston and would comply with the minimum distance separation requirements.²⁰⁹ As proposed, the Channel 249A service area would contain 24,170 persons in an area of 2,460 square kilometers.²¹⁰ There would be a “net” gain of 7,090 persons resulting from the modification of the reference coordinates.²¹¹ The loss area would contain service from at least five other full-time stations and thus is well-served.²¹²

²⁰⁷ A copy of the consent is included as Exhibit K.

²⁰⁸ See Exhibit B (Technical Exhibit).

²⁰⁹ See *id.*

²¹⁰ See *id.*

²¹¹ See *id.*

²¹² See *id.*

IX. THE COMMISSION SHOULD GRANT THE COUNTERPROPOSAL OVER THE AUBURN PROPOSAL BECAUSE THE COUNTERPROPOSAL WOULD BETTER SERVE THE PUBLIC INTEREST.

66. Cox's Counterproposal presents a set of interrelated allotments that is mutually exclusive with the Auburn Proposal and would achieve a preferential arrangement of allotments based on the FCC's allotment priorities.²¹³ First local service would be provided to the communities of Gardendale, Jemison, and Goodwater, while Homewood would maintain its local service, thus invoking the third FM allotment priority. The Auburn Proposal, on the other hand, would provide only a second local FM transmission service to Auburn and thus invokes the fourth priority. Moreover, the Cox Counterproposal would replace a Class A station with a superior Class C station in Homewood and would provide a "net" gain in service to 221,595 persons over an area of 6,030 square kilometers. Examination of these mutually exclusive proposals according to the FM allotment priorities and resulting public interest benefits clearly weighs in favor of granting the Cox Counterproposal to the exclusion of the Auburn Proposal.

²¹³ *Revision of FM Assignment Policy and Procedures* at 90 FCC 2d 91. See, e.g., *Moncks Corner, Kiawah Island, and Sampit, South Carolina*, 15 FCC Rcd 8973, ¶ 16 (2000).

**X. SUMMARY OF PROPOSED AMENDMENTS TO FM TABLE OF
ALLOTMENTS 47 C.F.R. § 73.202(b).**

	<u>Present</u>	<u>Proposed</u>
Birmingham, Alabama	229C, 233C, 243C, 258C, 284C, 295C, 299C	229C, 233C, 243C, 258C, 284C, 299C
Clanton, Alabama	249A	--- (continues to be served by WKLF(AM))
Dadeville, Alabama	247A	262A
Homewood, Alabama	247A	295C
Gardendale, Alabama	---	247C2
Goodwater, Alabama	---	248A
Jemison, Alabama	---	249A
Orrville, Alabama	247A	300A
Talladega, Alabama	224A, 248A	224A

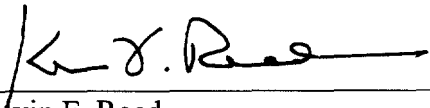
CONCLUSION

67. In light of the foregoing, the Commission should grant Cox's Counterproposal proposing the aforementioned mutually exclusive set of allotments and deny the Auburn Proposal.

Respectfully submitted,

COX RADIO, INC.

By: _____


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Elizabeth A. McGearry
Nam E. Kim
Jason E. Rademacher

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June 18, 2001

CERTIFICATE OF SERVICE

I, Sherene F. McDougall, hereby certify that a true and correct copy of the foregoing "Comments and Counterproposal of Cox Radio, Inc. and CXR Holdings, Inc." was sent on this 18th day of June, 2001, via first-class United States mail, postage pre-paid, to the following:

John A. Karousos*
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Auburn Network, Inc.
c/o Lee G. Petro, Esq.
Gardner, Carton & Douglas
1301 K Street, N.W.
Suite 900, East Tower
Washington, D.C. 20005-3317

Dale Broadcasting, Inc.
P. O. Box 909
Alexander City, AL 35051

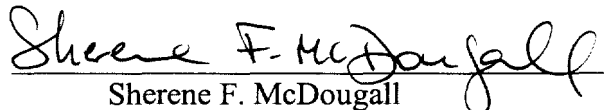
Scott Communications, Inc.
273 Persimmon Tree Road
Selma, AL 36701

Williamson Broadcasting, Inc.
702 East Battle Street, Suite A
Talladega, AL 35161

Southeastern Broadcasting Co.
P.O. Box 1820
Clanton, AL 35045

Marengo Broadcast Associates
5256 Valleybrook Trace
Birmingham, AL 35244

*denotes hand delivery


Sherene F. McDougall